

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

DWAYNE R. TORRENCE, JR.,

Plaintiff,

v.

BARTELS, M.D., *et al.*

Defendants

Civil Action No. SAG-20-1223

JOINT MOTION TO MODIFY SCHEDULING ORDER

Plaintiff Dwayne R. Torrence, Jr. and Defendants, by their undersigned counsel, jointly move for an Order modifying the Court's December 2, 2020 Scheduling Order.

As grounds for this Motion, the parties state as follows:

1. The parties have met and conferred about the March 1, 2021 deadlines. The parties will file a separate status report about their agreement with respect to the March 1, 2021 deadlines.
2. At the same time, the parties discussed electronically stored information and engaged in an informal discovery discussion.
3. Based on that discussion, the parties agree that a small extension of the discovery deadlines will allow the case to be best developed for presentation to the Court. Modifying the scheduling order may also allow for potential settlement discussions. The parties are not prepared to engage in settlement discussions until after Plaintiff has been deposed.

4. Specifically, the parties believe a two-month extension of most of the current deadlines would be optimal. No party will be prejudiced by these modifications and there is no trial date currently scheduled.

5. The parties jointly request that the Scheduling Order be modified as follows:

April 4, 2021 [no change]:	Deadline for moving for joinder of additional parties and amendment of pleadings
June 21, 2021:	Plaintiff's Rule 26(a)(2) disclosures
July 16, 2021:	Defendants' Rule 26(a)(2) disclosures
August 2, 2021:	Plaintiff's rebuttal Rule 26(a)(2) disclosures
August 9, 2021:	Rule 26(e)(2) supplementation of disclosures and responses
September 1, 2021:	Discovery deadline; submission of status report
September 8, 2021:	Requests for admission
October 4, 2021:	Dispositive pretrial motions deadline

A proposed Order to this effect is attached.

Respectfully submitted,

**MARKS, O'NEILL, O'BRIEN,
DOHERTY & KELLY, P.C.**

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